
OAR Box 1214

Prepped by Ollie Stewart

Document Number:

40) IV-D-6

Docket Number:

A-91-46

A-91-46
IV-D-06

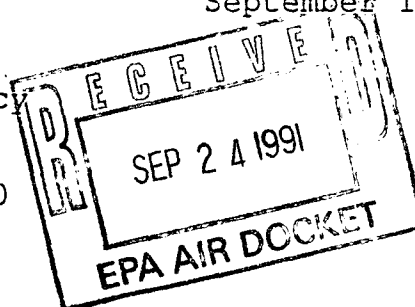


FLYING J INC.

333 WEST CENTER - P.O. BOX 540180 - NORTH SALT LAKE CITY, UTAH 84054-0180

September 18, 1991

Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M Street S.W., Room M-1500
Washington, D.C. 20460



Gentlemen:

I am writing in support of Ethyl Corporations waiver application to use HiTEC 3000 as a gasoline additive to boost octane.

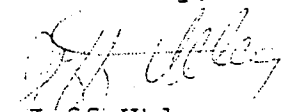
As a small U.S. Refiner the use of this additive will allow us to stay competitive with major refiners and continue to fill a very important role in the U.S. gasoline marketplace. The octane boost provided by this additive will be the cheapest octanes available and will help small refiners meet the new reformulated gasoline specifications.

The extensive work done by Ethyl has shown HiTEC 3000 will reduce emissions, this has to be one of the most cost effective strategies available to reduce emissions. Specifically NOx reduction will be very expensive for refiners. This additive could certainly help reduce this cost.

The data Ethyl produced for this waiver application is solid evidence that HiTEC 3000 will help the refinery industry in the U.S. while providing an environmental benefit. It is an example of how a problem can be solved and yet provide a dual benefit.

It is our hope that the agency will give this request careful consideration and ultimately approval.

Sincerely,


Jeff Utley
Refinery Manager

JU/bn